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Attorneys for Defendants
 NIKE, INC., NIKE USA, INC., AND
 NIKE RETAIL SERVICES, INC.
(See Signature Page for complete list of parties represented.)

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

DUSTIN GORMLEY, individually and on
 behalf of all others similarly situated,
 Plaintiffs,

v.

NIKE, INC., an Oregon corporation,
 Defendant.

Consolidated Case No. 11-cv-00893-SI

**STIPULATION AND [PROPOSED] ORDER
 TO COORDINATE RELATED CASES**

ERIKA MCCARTNEY, on behalf of herself
 and all others similarly situated,

Plaintiff,

v.

NIKE, Inc., an Oregon corporation; and
 DOES 2 through 20,

Defendants.

Judge: Hon. Susan Illston
 Place: Courtroom 10, 19th Floor

Trial Date: Not Yet Set

KRISTEN L. HARTMAN, an individual, on
 behalf of herself and all others similarly
 situated,

Plaintiff,

v.

Related Case No. 11-cv-02451-SI

NIKE USA, INC., an Oregon Corporation;
NIKE RETAIL SERVICES, INC., an Oregon
Corporation, and DOES 1 through 50,
inclusive,

Defendants.

Plaintiffs Dustin Gormley, Erika McCartney, and Kristen L. Hartman, and defendants Nike, Inc., Nike USA, Inc., and Nike Retail Services, Inc. (collectively, “Nike”), by and through their respective counsel, jointly submit the following Stipulation that the above-captioned related actions be coordinated.

RECITALS

WHEREAS, the above-captioned cases, *Dustin Gormley v. Nike, Inc.* (“*Gormley*”) and *Erika McCartney v. Nike, Inc., et al.* (“*McCartney*”), Consolidated Case No. 11-cv-00893-SI, and *Kristen L. Hartman v. Nike USA, Inc., et al.*, Case No. 11-cv-02451-SI (“*Hartman*”) have been designated as related cases and assigned to the same judge;

WHEREAS, the consolidated *Gormley/McCartney* action and the *Hartman* action are scheduled for a joint case management conference on July 29, 2011; and

WHEREAS, the three cases warrant coordination because they involve common questions of law and fact and because coordination would advance the interests of judicial economy and efficiency.

STIPULATION

NOW, THEREFORE, IT IS STIPULATED AND AGREED, by the parties, through their respective counsel of record, as follows:

1. The consolidated *Gormley/McCartney* action and the related *Hartman* action should be coordinated. Plaintiffs, however, wish to maintain the independence of their complaints and preserve the separate nature of their actions and defenses.

2. The parties will coordinate and jointly meet and confer regarding discovery, class certification, dispositive motions, and other pretrial issues to avoid inefficiencies and duplicative efforts. For example, the parties agree that judicial economy and efficiency mandate coordinated discovery and briefing with regard to class certification and dispositive motions.

1 3. In order to facilitate coordination of discovery, class certification, dispositive
2 motions, and other pretrial issues, the parties agree that the cases should proceed under one case
3 number as follows: all filing should occur in the lower numbered consolidated
4 *Gormley/McCartney* action and the coordinated higher numbered *Hartman* case should appear
5 below it in the caption.

6 ///

7 ///

8 ///

1 **IT IS SO STIPULATED.**

2 Dated: July 19, 2011

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6 /s/ Matthew M. Brown

Matthew M. Brown

Attorneys for Defendants
NIKE, INC., NIKE USA, INC., AND NIKE RETAIL
SERVICES, INC.

11 Dated: July 19, 2011

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15 /s/ Chad A. Saunders

Chad A. Saunders

Attorneys for Plaintiff
DUSTIN GORMLEY

19 Dated: July 19, 2011

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22 /s/ Robert B. Hancock

Robert B. Hancock

Attorneys for Plaintiff
ERIKA MCCARTNEY

1 Dated: July 19, 2011

FINEMAN & ASSOCIATES
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3 /s/ Neil B. Fineman

4 Neil B. Fineman

5 Attorneys for Plaintiff
6 ERIKA MCCARTNEY

7
8 Dated: July 19, 2011

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9 GENE J. STONEBARGER (209461)
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11 /s/ Gene J. Stonebarger

12 Gene J. Stonebarger

13 Attorneys for Plaintiff
14 KRISTEN L. HARTMAN

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this Stipulation to Coordinate Related Cases.

Dated: July 19, 2011

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MATTHEW M. BROWN (264817)

/s/ Matthew M. Brown

Matthew M. Brown

Attorneys for Defendants
NIKE, INC., NIKE USA, INC., AND NIKE
RETAIL SERVICES, INC.

[PROPOSED] ORDER

Based on the foregoing, and good cause appearing, **IT IS HEREBY ORDERED** that:

1. The following related cases shall be and hereby are coordinated: *Dustin Gormley v. Nike, Inc.* and *Erika McCartney v. Nike, Inc., et al.*, Consolidated Case No. 11-cv-00893-SI, and *Kristen L. Hartman v. Nike USA, Inc., et al.*, Case No. 11-cv-02451-SI. The coordinated cases shall proceed under one case number as follows: all filing should occur in the lower numbered consolidated *Gormley/McCartney* action and the coordinated higher numbered *Hartman* case shall appear below it in the caption.

2. The parties shall coordinate and shall jointly meet and confer regarding discovery, class certification, dispositive motions, and other pretrial issues.

IT IS SO ORDERED.

Dated: 7/20/11



THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE

C-11-2451 SHALL BE ADMINSTRATIVELY TERMINATED

PROOF OF SERVICE
(FRCP 5)

I hereby certify that on July 19, 2011, I electronically filed the:

**STIPULATION AND [PROPOSED] ORDER TO COORDINATE RELATED
CASES**

with the clerk using the CM/ECF system, which will send notification of such filing to the
following attorneys of record at the following listed email addresses:

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I am personally and readily familiar with the business practice of Cooley LLP for collection and
processing of correspondence for mailing with the United States Postal Service, and I caused such
envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at
San Francisco, California, on the following part(ies) in this action:

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Co-Counsel for Plaintiff Dustin Gormley

